

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: : CHAPTER 13
ANTHONY WATLINGTON, JR. : CASE NO.: 1:19-bk-02150-HWV
LINDSEY A. WATLINGTON :
Debtors :

JOINT DEBTOR'S MOTION TO TERMINATE WAGE ATTACHMENT

AND NOW COMES, Joint Debtor, Lindsey A. Watlington, by and through her attorneys, Jacobson, Julius & Harshberger, who hereby files this Motion to Terminate Wage Attachment and in support thereof states:

1. Joint Debtor filed a Chapter 13 Petition on or about May 16, 2019.
2. This Honorable Court approved a wage attachment of Joint Debtor's wages on June 18, 2019 and further directed Commonwealth of Pennsylvania to withhold funds from Joint Debtor's wages to pay the Chapter 13 Trustee.
3. Joint Debtor files this motion seeking an order terminating said wage attachment because the Joint Debtor is in the process of paying off the plan, and no further payments are necessary to the Chapter 13 Trustee.

WHEREFORE, Joint Debtor respectfully requests that this Court enter an order directing the above-mentioned employer to terminate the payments to the Chapter 13 Trustee.

Respectfully Submitted,

JACOBSON, JULIUS AND HARSHBERGER

Dated: July 13, 2022

/s/ Chad J. Julius
ID# 209496
8150 Derry Street
Harrisburg, PA 17111.5260
717.909.5858

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PROOF OF SERVICE

AND NOW, this 13th day of June 2022, I, Dera Shade, with Jacobson, Julius & Harshberger, attorneys for the Debtors, hereby certify that on this day I served the within *Motion to Terminate Wage Attachment* upon the following persons by forwarding the same via CM/ECF and/or first-class mail—

Jack N. Zaharopoulos, Esq.
8125 Adams Drive Suite A
Hummelstown, PA 17036

Office of U.S. Trustee
228 Walnut Suite 1190
Harrisburg, PA 17108

PennDOT Engineering District 8-0
Attn: Payroll Clerk
2140 Herr Street
Harrisburg, PA 17103-1699

By: /s/Dera Shade
Dera Shade, Paralegal

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LINDSEY A. WATLINGTON	:
Debtors	:

UPON CONSIDERATION of the above-referenced Joint Debtor, Lindsey A. Watlington, having filed a *Motion to Terminate Wage Attachment* under Chapter 13 of the Bankruptcy Code;

IT IS HEREBY ORDERED that the Motion is GRANTED and that the entity from whom Debtor receives income:

PennDOT Engineering District 8-0
Attn: Payroll Clerk
2140 Herr Street
Harrisburg, PA 17103-1699

shall terminate all deductions and wage attachments remitted to Chapter 13 Trustee, Jack N. Zaharopoulos, from said Debtor's income, previously ordered by this Honorable Court on June 19, 2019.